

January 23, 2014

Senator Andres Ayala
Representative Selim G. Noujaim
Legislative Regulation Review Committee
State Capitol, Room 011
Hartford, CT 06106

Re: Fuel Sulfur Content Limitations for Stationary Sources

Dear Senator Ayala and Representative Noujaim:

Pursuant to section 4-170 of the Connecticut General Statutes (CGS), I submit for your consideration and approval a proposal to amend the air quality regulations concerning control of sulfur dioxide (SO₂) emissions. A key component of the proposal is a new air quality regulation concerning fuel sulfur content limitations for stationary sources.

The proposal updates and clarifies existing regulations and adopts new fuel sulfur content restrictions for distillate, residual, kerosene and aviation fuels used in all non-mobile equipment for purposes other than heating. The primary purpose of the proposal is to limit the sulfur content of fuel oils burned in stationary sources to reduce emissions of SO₂, an air pollutant and contributor to the formation of the pollutant fine particulate matter (PM_{2.5}). The reduction in SO₂ emissions is important to reduce visibility-impairing emissions that contribute to regional haze and protect the public health from the adverse health impacts of SO₂ and PM_{2.5} pollution.

The proposal recognizes the limitations of the sulfur content of home heating oil and off-road diesel fuel that were adopted in 2013 under CGS section 16a-21a. Fuels regulated by CGS section 16a-21a are exempt from regulation under the proposal. However, the fuel sulfur content limitations of this proposal for distillate fuel oil are the same as those of CGS section 16a-21a.

We anticipate that these proposed fuel sulfur content regulations will have minimal financial impacts, because the trend in New York, New Jersey, and New England is toward low sulfur content for all fuels (e.g., fuels used in transport, home heating, and/or stationary sources), and refineries in the region have invested in the infrastructure required to produce these low sulfur fuels. Furthermore, the benefits from removing sulfur from these fuels – measured in avoided adverse health costs, reduced equipment maintenance, and ecosystem health – are substantial.

If there are any general questions regarding this submission, please contact Robert LaFrance, DEEP's Legislative Liaison, at 860-424-3401 (office) or 860-622-1797 (cell). If you have any substantive or rule drafting questions, please contact Merrily A. Gere of the Bureau of Air Management at 860-424-3416. Thank you for your assistance with this matter.

Sincerely,

/s/ Daniel C. Esty
Commissioner

cc: Robert LaFrance, DEEP